

ATTACHMENT C
SUMMARY OF DEPOSITION TESTIMONY FROM AEP SERVICE CORP. MECHANICAL ENGINEERS

ENGINEER	CI NUMBER- PLANT/UNIT	TESTIMONY REGARDING PREPARATION OF CI	DEPO. DESIGNATIONS REGARDING EMPLOYMENT	DEPO. DESIGNATIONS REGARDING CAA/NSR TRAINING/ANALYSIS
Jeff A. Brediger	CI # 31140 – Tanners Creek Unit 4	24:20-23	AEPSC Engineer (5:5- 12, 6:16-18, 8:9-16)	-Did not receive training on environmental regulatory requirements with respect to completion of construction projects at boiler units (62:24-63:4, 63:15-19) -Never conducted a permit analysis, emissions calculations, or permit for review for capital projects (64:12-66:24); -Does not know whether CI # 31140 was ever evaluated by AEP regarding the needing a permit (67:10-17)
Stephen Buchanan	CI# 12012 – Amos Unit 1	69:6-23	Former AEPSC, 1970- 1999 (12:1-24, 17:21- 18:14)	-Not familiar with the CAA, NSR, or PSD (33:18-35:8) -No environmental training at AEP (35:9-11); -Did not interact with AEP's environment division, and they did not train him (35:12-24) -Never determined whether a project was a major modification or routine maintenance (44:14-45:3) -No knowledge of WEPCO determination, no instructions about WEPCO rule/decision (46:21-47:5) -In preparing capital improvement requisitions ("CIs"), never evaluated whether project would trigger NSR/NSPS; not aware of that evaluation on any other projects; never asked to provide information so someone else could make that evaluation (63:18-64:11, 153:7-10, 155:15-18)

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Robert Cashner	CI # 72637 – Sporn Unit 5	32:5-12; 61:10-21, 67:16-68:21, 97:17- 98:5	Former AEPSC engineer, 1981-2000 (16:21-23, 18:7-19:24)	<ul style="list-style-type: none"> -Never spoke with AEP's environment division re air pollution issues or about Sporn Unit 5 condenser retubing project (105:15-21, 110:4-8) -Never involved in evaluating a CI for compliance with air pollution laws and regs (110:17-24) Not aware of any occasion when a capital improvement project was subject to review to determine whether it met air pollution requirements (111:16-20) Prior to meeting with counsel the week before the deposition, no understanding of what new source review (112:13-16), PSD (113:1-8), or WEPCO reg/rule (113:23-114:3) meant -To his knowledge not involved with NSR-related activities while at AEP (112:17-24) -Never involved in evaluating whether activity was "physical change" or "routine maintenance, repair, or replacement" (115:1-116:23) -No formal training at AEP re environmental laws and regulations (117:8-14)
James R. Cultice	CI # 72311 – Sporn Unit 5		7/85-11/88 – engineer at AEP hdqtrs – AEPSC employee (27:23-30:19); 11/88-04/01 –engineer in AEPSC MED (30:20-31:13)	<ul style="list-style-type: none"> -Did not discuss capital improvements with AEP's environmental division or perform environmental review of such improvements (97:15-99:5); -Not aware of any occasions when a project was subject to review to determine whether it met air pollution requirements (100:2); -Never heard of NSR 100:3-22); -Never heard of PSD or prevention of significant deterioration (100:23-101:5) -Never involved in any work relating to PSD program in connection with any of the CIs that he worked on (101:9-13)

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Elie Dallal	CI # 72442 – Kammer Unit 1 CI # 72863/72864/7290 8 – Kammer Unit 2 CI # 72462 – Mitchell Unit 1 CI # 72721 – Mitchell Unit 1 CI # 72722 – Mitchell Unit 2 CI # 72206 – Mitchell Unit 2 CI # 72875/72850 – Mitchell Unit 2 CI # 31739 – Tanners Creek Unit 4	119:10-19; 93:10- 94:15; 97:14-98:2; 103:20-104:7; 109:12- 20; 108:16-22; 106:22- 107:4 128:4-15; 118:19- 119:4; 73:23-76:18	Former AEPSC engineer (12:1-16, 51:14-52:3)	-Did not discuss the following CIs with AEP's environment division: #72721/72722 (109:3-6); #31739 (91:5-20); #72863/72864 (97:18-98:16) -Not familiar with PSD/NSR (134:3-9) -Except for coal-switching project, never did an evaluation of a construction project at a unit under CAA (134:14-19)
Glenn S. Davis	CI # 75140 – Conesville Unit 1 CI # 75246 – Conesville Unit 2 CI # 75312 – Conesville Unit 2 CI # 75285 – Conesville Unit 3 CI # 71665 – Muskingum River Unit 5	69:9-20; 83:2-6; 34:15- 35:17; 42:6-10; 45:13- 20	First job out of college was with AEPSC in Canton (8:10-15); in AEPSC Boiler Section from 1984-1992, then operations (11:5-19)	-Never asked to consider whether project complied with NSR/PSD/CAA -never asked to determine whether project was a major mod -did not know who was in charge of determining whether projects complied with CAA (49:11-50:23)

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Michael B. Doherty	CI # 71448/71516 – Cardinal Unit 1 CI # 71449/71517 – Cardinal Unit 2 CI # 71450/71505– Muskingum River Unit 5	37:5-38:13; 62:21- 63:14; 78:3-5, 19-22, 24-79:6; 81:6-10, 84:7- 85:11; 92:12-16; 96:21- 97:23; 93:1-20; 107:10- 108:12; 109:13-110:6 113:20-115:5; 119:5- 120:11; 121:5-8, 121:13-122:17; 123:21- 124:6; 124:20-126:3.	AEPSC manager (13:12-15:12, 21:1-7; 26:1-3)	<p>-Was not the responsibility of the steam generation section to review specific capital improvement projects to determine whether they comply with CAA (33:3-8)</p> <p>-Attended no meetings at AEP re WEPCO decision (34:17-19);</p> <p>-WEPCO decision did not change in any way how the steam generation section reviewed capital improvement projects (34:23-35:2);</p> <p>-During his time in operations services (from 1995 forward) that section did not have the responsibility to review projects for purposes of determining whether they complied with the CAA (35:3-11)</p> <p>-During his career with AEP, he was never responsible for determining whether a physical change to a coal-fired boiler triggered NSR (35:12-17)</p> <p>-Did not specifically evaluate projects and determine doing anything that would change anything with respect to emissions (142:10-13)</p> <p>-Never analyzed whether physical changes to a coal-fired boiler triggered NSR(152:24-153:4, 153:6-10);</p> <p>-Does not recall providing facts to another AEP employee to analyze whether physical change triggered NSR (153:11-154:3);</p> <p>-Does not believe that any of the CIs he prepared or reviewed were analyzed to determine whether the projects triggered NSR (154:4-9, 154:20-155:2)</p> <p>-Never spoke with anyone in AEP's environmental division re any projects (155:15-19)</p>

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John Letcavits	CI# 12148 – Sporn Unit 3 CI# 72429 – Sporn Unit 4	116:4-118:5 71:14-73:7	AEPSC Engineer, but transferred to another part of the company	-No responsibilities re NSR while an engineer in the Steam Generating Section (30:9-13) -Doesn't know what NSR or PSD (30:18-32:4, 32:18- 33:6, 57:9-18) -No NSR training (37:12-40:18, 45:24-47:6) -He never reviewed a project to determine whether it was a major modification (47:18-22), including the CIs that he prepared (74:8-75:7, 80:3-6, 80:15-19, 126:2-6, 132:8-20) -Not his practice on projects to consult with AEP's environmental services personnel (147:9-19) -Never evaluated whether life extension could trigger PSD/NNSR (212:20-24)
James Pianta	CI# 12502 – Conesville Units 1,2,3 CI# 31737 – Tanners Creek Unit 4	43:19-21 96:9-17	AEPSC Engineer (8:13-18, (10:9-11, 10:17-11:9)	-No training on applicability of NSR to capital projects (27:9-12) -Did not get any general guidance in documents from AEP's environmental engineers re NSR (29:20-23); -At time he prepared CI # 12502, he did not consider whether project might not be routine maintenance, repair or replacement (88:3-7) -At time he prepared CI # 31737, he did not consider whether project might not be routine maintenance, repair or replacement (112:2-6)
H. Kevin Stogran	CI# 71966 – Muskingum River Unit 5	45:8-46:3	AEPSC Engineer (10:15-11:12, 25:11- 19)	-No understanding of what NSR is (32:21-23); nor PSD (34:24-35:4); nor NNSR (35:21-24); nor WEPCO Rule (36:23-24) -No seminars, videos, memos from AEP offices on environmental regulations

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David L. Wehner	CI # 72373 – Cardinal Unit 1 CI # 98085 – Cardinal Unit 2	30:13-31:2; 41:13-44:3; 46:8-47:10 100:10-101:10	AEPSC Engineer (8:1- 11:15)	-Never had responsibility to analyze whether modifications triggered CAA (22:1-5) -Did not analyze whether CI#s 72373 or 98085 triggered NSR (153:9-154:17)
Steven Zavodnick	CI # 12147/12166 – Sporn Unit 1 CI # 72421/72446 – Sporn Unit 2 CI # 72477 – Sporn Unit 5 CI # 72393 – Sporn Unit 5	88:15-90:16; 102:10- 103:14, 62:19-66:2	AEPSC engineer (12:14-20)	-No responsibilities regarding evaluating potential for NSR permit (23:1-5) -Not aware that project could trigger environmental permit requirements (32:17-21) -No involvement in emissions calculations (42:19-43:1); -No environmental training regarding permits (131:4-9)